

1 PHILLIP A. TALBERT
Acting United States Attorney
2 KEVIN C. KHASIGIAN
Assistant United States Attorney
3 501 I Street, Suite 10-100
Sacramento, CA 95814
4 Telephone: (916) 554-2700
5 Attorneys for the United States
6
7

8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 APPROXIMATELY \$40,000.00 IN
U.S. CURRENCY,
15 Defendant.
16

2:21-MC-00044-TLN-CKD

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and potential claimant Karen
18 DeGuzman (“claimant”), by and through their respective counsel, as follows:

19 1. On or about November 24, 2020, claimant filed a claim in the administrative forfeiture
20 proceeding with the Federal Bureau of Investigation (“FBI”) with respect to the Approximately \$40,000.00
21 in U.S. Currency (hereafter “defendant currency”), which was seized on September 15, 2020.

22 2. The FBI has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A)
23 to all known interested parties. The time has expired for any person to file a claim to the defendant currency
24 under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim to the defendant
25 currency as required by law in the administrative forfeiture proceeding.

26 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
27 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency
28 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture

proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.
That deadline was February 22, 2021.

4. By Stipulation and Order filed February 23, 2021, the parties stipulated to extend to March 22, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to April 22, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

6. Accordingly, the parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture shall be extended to April 22, 2021.

Dated: 03/22/21

PHILLIP A. TALBERT
Acting United States Attorney

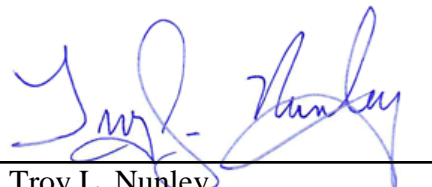
By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant United States Attorney

Dated: 03/22/21

/s/ Justin L. Ward
JUSTIN L. WARD
Attorney for potential claimant
Karen DeGuzman
(Signature authorized by phone)

IT IS SO ORDERED.

Dated: March 22, 2021


Troy L. Nunley
United States District Judge